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11 *Attorneys for Defendant Growth*  
12 *Cave, LLC*

13 UNITED STATES DISTRICT COURT  
14 CENTRAL DISTRICT OF CALIFORNIA  
15 (Western Division – Los Angeles)

16 SHAUNA BAKER,

17 Plaintiff,

18 v.

19 GROWTH CAVE, LLC, THREAD BANK,  
20 FINMKT, INC., FUND MY CONTRACT,  
21 LLC, GNOSIS LABS, INC. dba  
22 WIZEBANK NA aka ELECTIVE,  
23 UNIVERSAL FINANCE, INC, dba UGA  
24 FINANCE, LUCAS LEE-TYSON, and  
25 OSMANY BATTE aka “OZZIE  
26 BLESSED,”

27 Defendants.  
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Case No. 2:24-CV-01770 SB (PDx)

**JOINT STIPULATION TO  
DISMISS GROWTH CAVE  
PERSUANT TO FRCP  
41(A)(1)(A)(II)**

Complaint Filed: March 5, 2024

**TO THE COURT:**

The parties hereto, Defendant Growth Cave, LLC (“Growth Cave” or “Defendant”) and Plaintiff Shauna Baker (“Plaintiff”) by and through their respective counsel, hereby stipulate as follows:

WHEREAS, Plaintiff filed the Complaint in Case No. 2:24-CV-01770 on March 5, 2024 (the “Litigation”);

WHEREAS, Plaintiff’s claims against Growth Cave are subject to arbitration pursuant to an agreement executed by the Parties; and

WHEREAS, on May 16, 2024, Growth Cave filed an Answer in the Litigation, asserting the fact that this case should be in arbitration as an affirmative;


WHEREAS, the Parties agree to arbitrate Plaintiff’s claims against Growth Cave pursuant to JAMS’ non-consumer Comprehensive Arbitration Rules & Procedures, with the arbitration to be conducted by a mutually agreed-upon JAMS arbitrator in Los Angeles, California.

**NOW, THEREFORE**, the Parties, by and through their respective counsel, and pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), hereby agree and stipulate to the dismissal of Plaintiff’s claims against Growth Cave, with prejudice.

IT IS SO STIPULATED.

Dated: May 31, 2024

ORSUS GATE LLP

By:   
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Denis Shmidt  
*Attorneys for Defendant Growth Cave,  
LLC*

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4 Dated: May 31, 2024

LAW OFFICE OF SARAELLEN  
HUTCHISON, PLLC

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7 By:   
8 SaraEllen Hutchison  
9 *Attorney for Plaintiff, Shauna Baker*  
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**CERTIFICATION OF SERVICE**

The undersigned hereby certifies that on June 4, 2024, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system.

By: Jennifer M. Haidar  
Jennifer Haidar